

**MEMO ENDORSED**

86 Chambers Street  
 New York, New York 10007

July 22, 2025

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, NY 10007

Re: *International Refugee Assistance Program v. U.S. Citizenship and Immigration Services*,  
 25 Civ. 4900 (ALC)

Dear Judge Carter:

I write with the consent of plaintiff's counsel in this Freedom of Information Act (FOIA) case to request a one-week extension of the government's time to answer or otherwise respond to the complaint, which is otherwise tomorrow, July 23, 2025.

This action concerns a FOIA request seeking a directive from U.S. Citizenship and Immigration Services (USCIS) ordering a "pause on adjudicating adjustment of status [] applications filed by refugees and asylees." Compl. ¶ 2, ECF No. 1. Yesterday, USCIS made a production that it believes satisfies plaintiff's request. The parties are conferring about appropriate next steps. In order to allow these discussions to continue without the press of immediate litigation deadlines, we respectfully request that the government's time to answer or otherwise respond to the complaint be extended by one week, or until July 30, 2025.

The parties thank the Court for its consideration of this submission.

Respectfully,

JAY CLAYTON  
 United States Attorney

By: /s/ Peter Aronoff  
 PETER ARONOFF  
 Assistant United States Attorney  
 86 Chambers Street, 3rd flc  
 New York, NY 10007  
 Counsel for Defendant

SO ORDERED:  
  
 HON. ANDREW L. CARTER, JR.  
 UNITED STATES DISTRICT JUDGE

cc (via ECF): Counsel for plaintiff

July 22, 2025  
 New York, NY